

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	DECLARATION IN SUPPORT
-v.-	:	OF FINAL ORDER OF
	:	<u>FORFEITURE</u>
SABITRI LAFOREST,	:	
	:	21 Cr. 272 (CM)
Defendant.	:	
	:	
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Matthew R. Shahabian, pursuant to Title 28, United States Code, Section 1746,  
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York. I am now responsible for the above-captioned matter, and as such, I have become familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government’s submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about June 16, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the “Preliminary Order of Forfeiture”) (D.E. 131) with respect to SABITRI LAFOREST (the “Defendant”), which forfeited to the United States all right, title and interest of the Defendant in, among other things, the following specific property:

- a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 6805 NW 70<sup>th</sup> Place, Pompano Beach, FL 33067, owned by GARRY LAFOREST and the Defendant (the “Pompano Beach Property”);
- b. One 2019 Chevrolet Corvette ZR-1 bearing VIN 1G1Y42D9XK5801366;
- c. \$4,354.95 in United States currency, formerly on deposit in TD Bank, N.A. account number 4277377466 in the name of the Prive Group LLC;

- d. \$914,640.64 in United States currency, formerly on deposit in TD Bank, N.A. account number 4339985496 in the name of the Prive Hospitality Group LLC (the “Prive Hospitality TD Bank Account”);
- e. \$8,997.16 in United States currency, formerly on deposit in JP Morgan Chase Bank, N.A. account number 226099163 in the name of Laforest Consulting Inc.;
- f. \$120,200.20 in United States currency, formerly on deposit in Robinhood Securities LLC account number 423563741 held in the name of Sanjay Laforest, as the clearing broker for Robinhood Financial LLC or At Cash Management ACH account number 40902423563741 managed by Robinhood Securities and Robinhood Financial;
- g. \$10.99 in United States currency, formerly on deposit in Bank of America, N.A. account number 483069015161 in the name of Tatiana Laforest (the “Bank of America Account”);
- h. \$740.19 in United States currency, formerly on deposit in TD Bank, N.A. account number 4338908548 in the name of Tatiana Laforest (the “Laforest TD Bank Account”);
- i. \$6,487.32 in United States currency, formerly on deposit in Robinhood Securities LLC account number 687147108 held in the name of Tatiana Laforest, as the clearing broker for Robinhood Financial LLC (the “Robinhood Securities Account”);
- j. One Tag Heuer 2000 WN1153 Professional Watch Men’s 18K Rose Gold Silver 2-Tone;
- k. One Cartier Roadster Chronograph Automatic OR 750/ACIER 18K Gold & Steel Men’s 2618;
- l. One Omega Constellation Chronometer Men's Watch Automatic Steel/Gold;
- m. One Rolex Oyster Perpetual Lady DateJust Gold Stainless Steel with Diamond Bezel;
- n. One Omega Constellation Ladies 18K Yellow Gold Stainless Steel Diamond Bezel Watch;
- o. One Lucien Picard Silver, square, men’s watch;
- p. One Bulova Marine Star 100m, w/ broken silver bracelet;

- q. One Bulova Marine Star 100m, w/ leather strap;
- r. One Bulova Women's silver watch with gold looking arms silver bracelet;
- s. One Bulova Marine Star 100m, w/ silver and gold bracelet and blue and gold bezel;
- t. One Invicta Men's Watch 22448 Bolt Zeus Black Dial Chronograph Dial Gold Tone Steel;
- u. Citizen Eco-Drive men's watch 200m with silver bracelet;
- v. Citizen Eco-drive women's watch with gold like bezel and arms; and
- w. One Stainless Steel Cartier Roadster large silver Dial Mens Watch; Model number: W62025V3; Serial number: 2510 230669CE;

(a. through w., collectively, the "Specific Property").

3. On or about June 16, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (D.E. 132) with respect to GARRY LAFOREST, which forfeited to the United States all right, title and interest of GARRY LAFOREST in, among other things, the Specific Property.

4. On or about June 4, 2024, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (D.E. 182) with respect to SANJAY LAFOREST, which forfeited to the United States all right, title and interest of SANJAY LAFOREST in \$352,730.58 in United States currency seized from the Prive Hospitality TD Bank Account, and the Robinhood Securities Account.

5. On or about June 4, 2024, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (D.E. 185) with respect to TATIANA LAFOREST, which forfeited to the United States all right, title and interest of TATIANA LAFOREST in, among other things, the Bank of America Account, the Laforest TD Bank Account, and the Robinhood Securities Account.

6. On or about June 16, 2023, the Court entered a Consent Order of Interlocutory Sale of Real Property as to the Pompano Beach Property, authorizing the Defendant and GARRY LAFOREST to sell the Pompano Beach Property, and the net proceeds from the sale shall be substitute *res* for the Pompano Beach Property.

7. On or about May 16, 2024, the Government received a check for \$3,851.61 in United States currency representing the proceeds from the sale of the Pompano Beach Property (the “Pompano Beach Property Proceeds”).

8. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on October 10, 2023 for thirty (30) consecutive days, through November 8, 2023, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on August 29, 2024 (D.E. 195).

9. On or about May 21, 2024, Notice of the Preliminary Order of Forfeiture was sent by certified and regular mail through the United States Postal Service: Miami Lakes Chevrolet, 16600 NW 57<sup>th</sup> Ave, Miami, FL 33014 (the “Noticed Party”).

10. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

11. The Defendant, GARRY LAFOREST, SANJAY LAFOREST, TATIANA LAFOREST and the Noticed Party are the only people and/or entities known by the Government to have a potential interest in the Specific Property.

12. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

13. No previous application for the relief requested herein has been sought.

Dated: New York, New York  
August 29, 2024

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:                     /s/                      
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